



USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 2/26/2025
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February 26, 2025

**VIA ECF**

The Honorable Mary Kay Vyskocil  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Aminov et al.*, 23-CR-110 (MKV)**

Dear Judge Vyskocil:

I write regarding my representation of Ms. Christy Corvalan in the above-captioned matter. This Court sentenced Ms. Corvalan on December 2, 2024. Ms. Corvalan will surrender to her assigned facility on April 30, 2025, and remains under the supervision of U.S. Pretrial Services until that date. At this time, I am respectfully requesting amendments to Ms. Corvalan's bail conditions to accommodate important family responsibilities in preparation for her surrender date.

Pursuant to a \$500,000 PRB, Ms. Corvalan's current bail package includes the condition of home detention. *See* ECF 16. I write to respectfully request that the Court modify Ms. Corvalan's bail conditions to replace her home detention condition with a curfew condition, leaving in place GPS monitoring. The reason for this request is that Ms. Corvalan has maintained compliance with her current bail conditions and has a daughter who is preparing for the birth of her first child. Her due date is March 7, 2025, and she has begun moving into the basement of her current residence, immediately next to Ms. Corvalan's, to prepare for the baby. Per the doctor's instructions, Ms. Corvalan's daughter is not supposed to move or lift any heavy objects, so Ms. Corvalan is hoping to help her move, build, organize, and paint the space, in addition to running any other errands for her, as needed. Additionally, Ms. Corvalan is hoping to have the flexibility to help her youngest daughter complete any necessary legal and medical paperwork required while she is away (POA forms, *etc.*), as well as with smaller tasks like helping her shop for a prom dress.

Curfew imposed by U.S. Pretrial Services would allow Ms. Corvalan to better accommodate these family demands and last-minute changes to her schedule. U.S. Pretrial Services, through Officer Jessica Aguilar-Adan, has no objection to this request, given the extent of Ms. Corvalan's family demands during this period immediately before her surrender date. Officer Aguilar-Adnan requests that curfew hours be set by U.S. Pretrial Services, if the Court grants the curfew request.

Furthermore, under the current monitoring rules and even potentially under a curfew, Ms. Corvalan may be unable to accompany her daughter to the hospital and/or attend the birth of her first grandchild. U.S. Pretrial Services, through Officer Jessica Aguilar-Adan, recommended that Ms. Corvalan request specific Court approval to accompany her daughter to/from the hospital and attend the child's birth from any time from February 27<sup>th</sup> to March 21<sup>st</sup>.

The Government, through AUSA Jeffrey Coyle, has indicated that it defers to U.S. Pretrial Services regarding these requests.

Thank you for the Court's consideration.

Respectfully submitted,

/s/

Aaron Mysliwicz  
*Attorney for Christy Corvalan*

cc: AUSA Jeffrey Coyle, *via* ECF & Email  
USPO Jessica Aguilar-Adan, *via* Email

**Defendant's request to replace her home detention condition with a curfew condition is DENIED. Defendant is GRANTED a limited modification from her current bail conditions to allow her to accompany her daughter to the hospital and for the three days following the birth of her grandchild, as long as she notifies her U.S. Pretrial Services Officer and checks-in daily during that four day period.**

**The Clerk of Court is respectfully requested to terminate the motion pending at docket entry 439.**

**SO ORDERED.**

Date: 2/26/2025  
New York, New York

  
Mary Kay Vyskocil  
United States District Judge